

# LATHAM & WATKINS<sup>LLP</sup>

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February 6, 2006

## VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Infonet Telecommunications Corporation,  
Certification of CPNI Filing (February 6, 2006)**

***EB Docket Nos. 06-36, EB-06-TC-060***

Dear Ms. Dortch:

Pursuant to the Commission's Public Notices issued January 30, 2006 and February 2, 2006 in the above-captioned proceedings, Infonet Telecommunications Corporation submits the attached Statement of Operating Procedures and Certification of compliance with the Commission's customer proprietary network rules.

If you have questions regarding this matter, please contact the undersigned at (202) 637-2120.

Sincerely,



Jeffrey A. Marks

Enclosures

**Infonet Telecommunications Corporation**  
**Statement of Operating Procedures**

Infonet Telecommunications Corporation ("ITC") employs the following procedures to ensure that it is in compliance with the Commission's customer proprietary network information ("CPNI") rules, 47 C.F.R. §§ 64.2001-64.2009.

From the last half of the calendar year 2005 to present, ITC has had no customers, and thus has no CPNI. Moreover, ITC's operations currently are dormant, with no current customers and no definitive plans for taking on new customers in the near future. ITC was created by its parent company, an information services provider to multi-national corporations, to provide interexchange telecommunications services exclusively to business customers on an individual contract basis. ITC has no residential customers and does not market to residential customers. Moreover, ITC has never engaged in any form of marketing campaign, having, in the past, served only as a provider of convenience for its parent company's multi-national information services clients.

ITC has established a supervisory review process to ensure compliance with the aforementioned confidentiality policies and with Commission rules. This process includes monitoring company practices, and officer certification of ITC's steps to ensure compliance, in conformance with 47 C.F.R. § 64.2009(e).

**Certification**

I, Steven L. Mashal, certify under penalty of perjury that I am Assistant Secretary of Infonet Telecommunications Corporation ("ITC"), that I have personal knowledge that ITC has established the practices and policies described in the foregoing Statement of Operating Procedures and that those practices and policies are adequate to ensure compliance with 47 C.F.R. §§ 64.2001-64.2009, to the best of my information, knowledge and belief.

Executed on February 6, 2006.

A handwritten signature in black ink, appearing to read "St L. Mashal", written over a horizontal line.

Steven L. Mashal  
Assistant Secretary  
Infonet Telecommunications Corporation